

Michael W. Sobol (State Bar No. 194857)
Nicole D. Reynolds (State Bar No. 246255)
LIEFF CABRASER HEIMANN & BERNSTEIN LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111
Telephone: (415) 956-1000
E-mail: msobol@lchb.com
nreynolds@lchb.com

Daniel M. Hattis (State Bar No. 232141)
HATTIS LAW
1134 Crane Street, Suite 216
Menlo Park, CA 94025
Telephone: (650) 980-1990
E-mail: dan@hattislaw.com

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MARTIN BLAQMOOR, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

TRACFONE WIRELESS, INC.

Defendant.

Case No. 13-cv-05295-EMC

**STIPULATION AND [PROPOSED]
ORDER REGARDING SCHEDULE ON
MOTION TO COMPEL ARBITRATION**

Pursuant to Local Rules 6-2 and 7-12, Plaintiff Martin Blaqmoor (“Plaintiff”) and Defendant TracFone Wireless, Inc. (“Defendant”), through their undersigned counsel, hereby stipulate as follows:

WHEREAS, on November 21, 2013, the Court related the above-entitled action to *Hansell v. TracFone Wireless, Inc.*, Case No. 13-cv-03440-EMC (N.D. Cal.) (the “*Hansell Action*”);

WHEREAS, on November 21, 2013, during the parties’ Initial Case Management Conference in the *Hansell Action*, the Court ordered the following schedule on the Motion to Compel Arbitration in the *Hansell Action*:

1. 12/19/13: Motion to Compel Arbitration Due;
2. 1/23/14: Opposition to Motion to Compel Arbitration Due;
3. 2/6/14: Reply in Support of Motion to Compel Arbitration Due;
4. 2/27/14 at 1:30 p.m.: Hearing on Motion to Compel Arbitration.

WHEREAS, on December 19, 2013, Defendant filed a Motion to Compel Arbitration in the *Hansell* Action, and also sought leave to file a Motion to Compel Arbitration in the above-entitled action and in another related case, entitled *Gandhi et al. v. TracFone Wireless, Inc.*, Case No. 13-cv-05296-EMC (N.D. Cal.);

WHEREAS, on December 20, 2013, the Court granted Defendant leave to file its Motion to Compel Arbitration in the above-entitled action (Dkt. No. 13), but didn't set a specific briefing schedule or a hearing for the motion;

WHEREAS, the parties have met and conferred and agree that the same briefing schedule set for the Motion to Compel Arbitration in the *Hansell* action should apply to this action;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, between Plaintiff, by his undersigned counsel, and Defendant, by its undersigned counsel, that the schedule on the arbitration motion in the *Hansell* Action also apply to this action, such that:

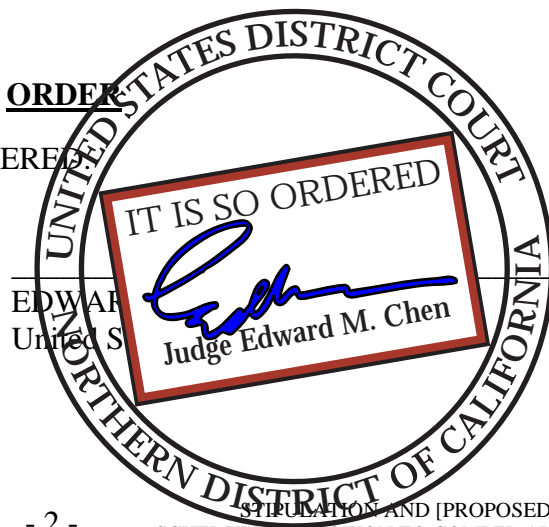
1. 1/23/14: Plaintiffs' Opposition to Motion to Compel Arbitration due;
2. 2/6/14: Defendant's Reply in Support of Motion to Compel Arbitration due;
3. 2/27/14 at 1:30 p.m.: Hearing on Motion to Compel Arbitration.

ORDER

Pursuant to Stipulation, it is so ORDERED.

Dated: 1/2/14, 2013

EDWARD M. CHEN
United States District Court



1 Dated: December 27, 2013

Respectfully submitted,

2 LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

3
4
5
6 By: /s/ Nicole D. Reynolds

7 Nicole D. Reynolds

8 Michael W. Sobol

9 msobol@lchb.com

Nicole D. Reynolds

10 nreynolds@lchb.com

LIEFF CABRASER HEIMANN & BERNSTEIN LLP

11 275 Battery Street, 29th Floor

12 San Francisco, CA 94111

Telephone: (415) 956-1000

13 Daniel M. Hattis

14 dan@hattislaw.com

HATTIS LAW

15 1134 Crane Street, Suite 216

16 Menlo Park, CA 94025

Telephone: (650) 980-1990

17 *Attorneys for Plaintiff*

1 Dated: December 27, 2013

SIDLEY AUSTIN LLP

2
3
4
5 By: /s/ Joel S. Feldman

Joel S. Feldman

6 Joel S. Feldman (admitted *pro hac vice*)

7 jfeldman@sidley.com

8 Lisa E. Schwartz (admitted *pro hac vice*)

lschwartz@sidley.com

9 SIDLEY AUSTIN LLP

One South Dearborn Street

10 Chicago, Illinois 60603

11 Ryan M. Sandroock

rsandroock@sidley.com

12 555 California Street, Suite 2000

13 San Francisco, California 94104

14 Steven J. Brodie (*pro hac vice* to be submitted)

sbrodie@carltonfields.com

15 Aaron S. Weiss (*pro hac vice* to be submitted)

aweiss@carltonfields.com

16 CARLTON FIELDS, P.A.

17 Miami Tower

100 SE Second Street, Suite 4200

18 Miami, FL 33131-2119

19 *Attorneys for Defendant*

20
21 **ATTESTATION**

22 I, Nicole D. Reynolds, am the ECF user whose identification and password are being used
23 to file this Stipulation. I hereby attest that Joel S. Feldman has concurred in this filing.

24
25 /s/ Nicole D. Reynolds

Nicole D. Reynolds